

MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

IN THE UNITED STATES DISTRICT COURT FOR THE

JULIO A. ZUNIGA

CIVIL ACTION/CLASS ACTION  
NO. 3:22-CV-00052United States Courts  
Southern District of Texas  
FILED

MAR 28 2022

v.

PATRICK O'DANIEL

Nathan Ochsner, Clerk of Court

1) PLAINTIFFS ON CIVIL ACTION NO. 3:22-CV-00052 and Julio Zuniga, PURSUANT to Rules 15(a) and 19(a), Fed. R. Civ. P., REQUESTS leave to File an Amended Complaint adding MULTIPLE PARTYS.

2.) Since the Filing of the complaint the plaintiff has determined that the name of the John Doe defendants are: Bridgette Hayes - (EX. WARDEN) FOR CONSPIRING TO COVER-UP MISCONDUCT/MALICE/HARRASSMENT/RETALIATION/with "Deliberate Indifference" CAUSING "IRREPARABLE HARM", IN MY PAROLE ELIGIBILITY Education Classes. Tia BEY: (SAFE PRISONS) RETALIATION/HARRASSMENT/DELIBERATE INDIFFERENCE/MALICE/CRUEL AND UNUSUAL PUNISHMENT, INTENTIONAL OPPRESSION, IRREPARABLE HARM, CONSPIRING TO ORGANIZE INTENTIONAL OPPRESSION ON IWOC MEMBERS

LORPU DORBER: (CO IV) DELIBERATE INDIFFERENCE, MALICE, ASSAULT (Bodily Fluids), CONSPIRING TO ATTACK IWOC MEMBERS, INTENTIONAL OPPRESSION, IRREPARABLE HARM, CORRUPTION, RETALIATION, HARRASSMENT, CRUEL AND UNUSUAL PUNISHMENT ON IWOC MEMBERS.

BRANDY SHANNON: DELIBERATE INDIFFERENCE, DUE PROCESS VIOLATIONS, CRUEL AND UNUSUAL PUNISHMENT, CONSPIRING TO ORGANIZE RETALIATION/HARRASSMENT.

PATTY POLK: DELIBERATE INDIFFERENCE, DUE PROCESS VIOLATIONS, CRUEL AND UNUSUAL PUNISHMENT, CONSPIRACY TO RETALIATE/HARRASS IWOC MEMBERS.

Charlotte McKnight: (PT OF CO'S) DELIBERATE INDIFFERENCE, DUE PROCESS RIGHTS VIOLATIONS, CONSPIRACY TO RETALIATE/HARRASS/MALICE/CRUEL AND UNUSUAL PUNISHMENT, IRREPARABLE HARM, INTENTIONAL OPPRESSION.

FREDRICK GOODEN: (major of CO'S) INTENTIONAL OPPRESSION, CONSPIRING TO PUSH INMATES TO SUICIDE, IRREPARABLE HARM, DELIBERATE INDIFFERENCE, MALICE, CORRUPTION, RETALIATION/HARRASSMENT/CONTRABAND ENTRAPMENT, CRUEL AND UNUSUAL PUNISHMENT

MARCUS COOPER: (major of CO'S) INTENTIONAL OPPRESSION, CONSPIRING TO PUSH INMATES TO SUICIDE, IRREPARABLE HARM, DELIBERATE INDIFFERENCE, MALICE, CORRUPTION, RETALIATION/HARRASSMENT, CRUEL AND UNUSUAL PUNISHMENT, DUE PROCESS VIOLATION

TANIKA HAPFORD: INTENTIONAL OPPRESSION, RETALIATION, HARRASSMENT, RACIAL DISCRIMINATION, MALICE, IRREPARABLE HARM, FIRST AMENDMENT, EIGHTH AMENDMENT VIOLATIONS,

ELISHA BAUGH: INTENTIONAL OPPRESSION, RETALIATION, HARRASSMENT, RACIAL DISCRIMINATION, MALICE, IRREPARABLE HARM, 1ST/8TH AMENDMENT RIGHTS VIOLATIONS

PLAINTIFFS will AMEND IN THE FUTURE FOR REMNANTS OF TEXAS BOARD OF CRIMINAL JUSTICE - BOARD MEMBERS.

3.) THIS COURT SHOULD GRANT LEAVE FREELY TO AMEND A COMPLAINT IN CLASS-ACTION: 3:22-cv-00052. FOMAN V. DAVIS, 371 U.S. 178, 182 (1962)

DATE 3/20/22

Physical Address For  
DEFENDANTS:

59 DARRINGTON RD.  
ROSHARON, TEXAS 77583

Respectfully Submitted,

JULIO A. ZANIGA

Julio A. Zaniga  
59 DARRINGTON RD.  
ROSHARON, TEXAS 77583

HONORABLE JUDGE JEFFEREY V. BROWN

TBCJ: DERNELYN PERRYMAN  
PASTOR LARRY MILES  
E.F. "MIANO" DE AYALA  
MOLLY FRANCIS  
FAITH JOHNSON  
SIDHAM SIV  
ERIC NICHOLS